

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:

Unlicensed Operation in the TV Broadcast
Bands

ET Docket No. 04-186

REPLY COMMENTS OF TELCORDIA TECHNOLOGIES

TELCORDIA TECHNOLOGIES, INC.
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February 23, 2012

INTRODUCTION

Telcordia Technologies, Inc. (hereafter Telcordia) herein provides Reply Comments regarding the Summary Report of the 45-Day public trial of the Telcordia TV Band Database system.

On December 2, 2011, the Federal Communications Commission (FCC) Office of Engineering Technology (OET) released a Public Notice announcing the “Opening of Public Testing for Telcordia Technologies, Inc’s TV Band Database System.”¹ The Notice stated that this was a limited trial that was intended to “allow the public to access and test Telcordia’s database system to ensure that it correctly identifies channels that are available for unlicensed radio transmitting devices that operate in the TV band (unlicensed TV band devices), properly registers those facilities entitled to protection, and provides protection to authorized services and registered facilities as specified in the rules.”

During the trial the December 2nd Public Notice encouraged participants to test:

- the channel availability calculator
- the MVPD receive site (cable headend and satellite receive site) registration utility
- the broadcast auxiliary temporary receive site registration utility
- the wireless microphone registration utility

“to ensure that each of these elements of the database system is working properly and providing the interference protection required under our rules.”

¹ DA 11-1956 Public Notice; “Office of Engineering and Technology Announces the Opening of Public Testing for Telcordia Technologies, Inc’s TV Band Database System.” 2 December, 2011.

In addition, participants were encouraged to report any inaccuracies or other issue with any aspect of the database system through the response facility on the website. Telcordia implemented a “comment” mechanism to provide for this feedback.

The December 2nd Public Notice required that “after the close of the trial, Telcordia will provide a summary report to OET that identifies: (1) problems reported and their disposition; and (2) descriptions of changes made to the channel availability calculator or registration systems.” On January 30, 2012 Telcordia provided a Summary Report of the 45-Day Public Trial of the Telcordia TV Bands Database System (hereinafter the Summary Report).

On February 1, 2012 the FCC OET issued a Public Notice² (hereafter Notice) seeking comment on the Telcordia Summary Report. Comments were due on February 16, 2012. Only one set of comments was received in response to the Notice³. Mr. Ward states that both the Telcordia system and the Spectrum Bridge system do not adequately protect the Very Large Array (VLA) radio telescopes, particularly with regard to “third harmonic interference.” Mr. Ward goes on to say that “The Very Large Array of radio telescopes needs certain frequencies set aside and protected from interference beyond the simple protected radio silence zones established by the FCC, the ITU and the IAU, and the NRAO.” Mr. Ward does not argue that either Telcordia or Spectrum Bridge fails to implement the FCC rules. The Telcordia TV Bands Database does provide protection from White Space Device use on all channels in a

² DA 12-118 Public Notice, “Office of Engineering Technology Requests Comment on the Public Testing of Telcordia Technologies, Inc.’s TV Bands Database System, February 1, 2012.

³ Comments of Patrick Ward

contour around the VLA as prescribed by the FCC. Any request to change the rules now, in comments and replies to the Telcordia Technologies Summary Report on the 45-Day Public Trial, is procedurally deficient and amounts to an untimely request for reconsideration. Mr. Ward needs to take his request directly to the FCC.

CONCLUSION

Telcordia respectfully reports that its trial was successful and that no commenting party raises questions with regard to Telcordia's implementation of its TV Bands Database system.

Respectfully submitted,

/s/ John P. Malyar

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